

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **DATE FILED:** _____

v. : **CRIMINAL NO. :** _____

SHAUN PETERSON : **VIOLATIONS:**

: **18 U.S.C. § 371 (conspiracy to commit**

: **armed bank robbery - 1 count)**

: **18 U.S.C. § 2113(d) (armed bank robbery -**

: **1 count)**

: **18 U.S.C. § 924(c)(1) (use and carrying of a**

: **firearm during and in relation to crime of**

: **violence - 1 count)**

: **18 U.S.C. § 2 (aiding and abetting)**

:

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about October 31, 2006, in Willow Grove, in the Eastern District of Pennsylvania, defendant

SHAUN PETERSON

conspired and agreed, together with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly and unlawfully commit armed bank robbery of the Sovereign Bank in Willow Grove (hereafter “the bank”), the deposits of which were insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

2. It was a part of the conspiracy that defendant SHAUN PETERSON and others committed an armed robbery of the Sovereign Bank located at 65 York Road in Willow Grove, Pennsylvania, at gunpoint and stole approximately \$11,426.

OVERT ACTS

In furtherance of the conspiracy, the defendant and others committed the following overt acts in the Eastern District of Pennsylvania:

On or about October 31, 2006:

1. Defendant SHAUN PETERSON and two other bank robbers entered the Sovereign Bank, located at 65 York Road in Willow Grove, Pennsylvania.

2. One of the robbers brandished two handguns, approached the teller windows, and shouted for the tellers to move back and not activate any alarms.

3. A second robber ran to the back of the bank and ordered an employee to open the bank vault.

4. Defendant SHAUN PETERSON went into the bank teller area, where he went into two of the tellers' cash drawers and stole approximately \$11,426 in cash.

5. Defendant SHAUN PETERSON and the two other robbers then fled from the bank in two motor vehicles and, subsequently, split the proceeds from the armed bank robbery.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 31, 2006, in Willow Grove, in the Eastern District of Pennsylvania, defendant

SHAUN PETERSON

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of the Sovereign Bank, 65 York Road, Willow Grove, Pennsylvania, lawful currency of the United States, that is, approximately \$11,426, belonging to, and in the care, custody, control, management and possession of the Sovereign Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant PETERSON knowingly and unlawfully assaulted and put in jeopardy, and aided and abetted the assault and putting in jeopardy of, the lives of the employees of Sovereign Bank, and other persons, by use of a dangerous weapon, that is, handguns.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 31, 2006, in Willow Grove, in the Eastern District of Pennsylvania, defendant

SHAUN PETERSON

knowingly used and carried, and aided and abetted the use and carrying, of a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to commit armed bank robbery in violation of Title 18, United States Code, Section 371, and armed bank robbery, in violation of Title 18, United States Code, Sections 2113(d) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney